



European Network  
Against Racism

# AI ROUNDTABLES: GREECE

Artificial Intelligence and Migration

REPORT



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# ABOUT THE NATIONAL ROUNDTABLES

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In 2019 ENAR engaged for the first time in digital rights issues. It was to highlight the use of technology against racialised communities in the context of policing. The result of this was the report **'Data-driven policing: The hardwiring of discriminatory policing practices across Europe'**<sup>1</sup>. One year later, we repeated the experience, this time focusing on the use of AI in recruitment and other human resources' processes publishing the **ENAR's Equal@work toolkit 'Artificial intelligence in HR'**<sup>2</sup>. In both cases we witnessed the need to include racial justice movements in the digital rights ecosystems because, without their intervention, the picture we have from the harms that technology inflicts to our communities is incomplete.

As a direct outcome, our work on digital rights increased to the extent of becoming one of our **flagship topics**. Between February and June 2023, we conducted a series of national roundtables in different EU countries to discuss the state of artificial intelligence (AI) with ENAR members and a varied number of additional stakeholders. The aim was to focus on a strategic theme and organise the event with the support of one of our members. We selected **migration, law enforcement, and redistribution of welfare** as the main topics and decided to set up key events in Greece, Croatia, and Denmark. For ENAR, the development of these roundtables were a step further toward introducing technological topics to our members, and it was also an opportunity to raise awareness and strengthen our network connections.

The meetings were designed with the idea of being a safe space for all to exchange ideas, doubts, and questions about the topics presented. In order to make the topics comprehensive and approachable enough we wanted to build strong links with current subjects they were already aware of and/or actively working on. For each session, we decided to invite a digital rights expert from the country who could provide country-specific insights.

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1 Williams, P., Kind, E. (2019). Data-driven policing: The hardwiring of discriminatory policing practices across Europe. <https://www.enar-eu.org/wp-content/uploads/data-driven-profiling-web-final.pdf>

2 Michael, L., Waterhouse-Bradley, B. (2020). Artificial intelligence in HR. How to address racial biases and algorithmic discrimination in HR? [https://www.enar-eu.org/wp-content/uploads/2020\\_equal\\_work\\_algorithmic\\_discrimination\\_1\\_.pdf](https://www.enar-eu.org/wp-content/uploads/2020_equal_work_algorithmic_discrimination_1_.pdf)

# INTRODUCTION

In February, we held the first of three country specific roundtables. We organised it in collaboration with one of our members, the Greek Council for Refugees, at the European Parliament Office in Athens.



In the effort of connecting national realities to our work, we invited Eleftherios Chelioudakis co-founder of Homo Digitalis who explained the different actions his organisation has taken to understand the deployment of high technology at the Greek border. Homo Digitalis is an organisation based in Greece, founded in 2018, that has a national and a European focus on digital rights topics. Together with ENAR, and other civil society organisations, we are part of the coalition [#ProtectNotSurveil](#), an initiative that advocates for a better regulation of the technologies used in the migration context.

Eleftherios is a lawyer in Greece with a hybrid background in law and computer science. He holds a LLB from National and Kapodistrian University of Athens, a LLM on Law and Technology from Tilburg University Law School and a MSc in Digital Humanities from the Computer Science School of KU Leuven.

**In a nutshell, the session was envisioned with the following objectives in mind:**

- Present ENAR's new area of work (digital rights) and the coalition we joined on AI and migration (work done, presentation of the website, next steps).
- Connect with our Greek members in Athens and get to know them better.
- Present our demands and recommendations as a coalition in the country where most of the technology is being deployed at the borders.
- Gather the attention of civil society organisations, journalists, and researchers with an interest to understand why they should have a closer look at what is happening at the Greek border.
- Create an open debate on what border control should look like.
- Map the interest on digital rights in Greece.

**To conduct this meeting in a timely manner, we designed some questions that would guide the discussion. Some of the questions we wanted to answer in this national roundtable were:**

- Why ENAR wanted to engage with the digital rights ecosystem?
- Why other civil society organisations should care about digital rights? What role could they play?
- What is the coalition [#ProtectNotSurveil](#) about?
- What are our demands as members of the coalition?

This report summarises the fruitful and important dialogue held during the meeting, in hopes of initiating new debates around the conceptualisation of law enforcement in Europe and its use of artificial intelligence, with a more focused care and intentionality towards racialised communities.

# GLOSSARY - KEY CONCEPTS

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**Automated decision-making systems (ADM systems):** Process that is partially or fully delegated to another entity who then decides to use intuitive models to accomplish a goal<sup>3</sup>.



**Artificial Intelligence (AI):** It is the use of extensive techniques that allows a computer and other kinds of machines to imitate human intelligence<sup>4</sup>.



**Artificial Intelligence Act (AI Act):** Regulation adopted by the European Parliament on 13 March 2024 that provides a framework for the development and use of AI within the European Union. However, it fails to regulate the use of these systems by law enforcement, migration, and national security authorities<sup>5</sup>.



**Data Protection Authority (DPA):** Independent public authorities that monitor the application of data protection law. They offer guidance and expertise on how to handle data violations of the General Data Protection Regulation (GDPR) and its respective laws at a national level<sup>6</sup>.



**Freedom of Information Act (FOIA request):** It is a tool that allows EU citizens, but also EU residents and civil society to obtain information from institutions at a European, national and local level. The kind of data that citizens can have access to are varied (agendas, minutes, official documents, archives...). The request to access documents is a mechanism that promotes transparency and accountability<sup>7</sup>.

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3 AlgorithmWatch (2019). Taking stock of automated decision-making in the EU. [https://algorithmwatch.org/en/wp-content/uploads/2019/02/Automating\\_Society\\_Report\\_2019.pdf](https://algorithmwatch.org/en/wp-content/uploads/2019/02/Automating_Society_Report_2019.pdf)

4 IBM. (2024). What is artificial intelligence (AI)? <https://www.ibm.com/topics/artificial-intelligence>

5 ENAR (2024). Joint Statement: How the EU AI Act fails migrants and people on the move. <https://www.enar-eu.org/joint-statement-a-dangerous-precedent-how-the-eu-ai-act-fails-migrants-and-people-on-the-move/>

6 European Commission (2024). What are Data Protection Authorities (DPAs)? [https://commission.europa.eu/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas\\_en](https://commission.europa.eu/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en)

7 AsktheEU.org (2024). About AsktheEU.org. <https://www.asktheeu.org/en/help/about>

# UNDERSTANDING THE USE OF AI IN THE CONTEXT OF MIGRATION

For a long time we have been hearing European politicians speak about the securitisation of Europe, also known as the so called **'fortress of Europe'**<sup>8</sup>. Greece, as one of the southern borders of the EU in the Mediterranean, is one of the important locations where securitisation is at its highest peak. The militarisation of the Greek border is possible due to the use of **intensive technology**, in many cases, funded by the European Commission<sup>9</sup>. New technologies are being used at different stages of the migration process. As the report 'Automating Immigration and Asylum' states, technologies are used at the border, but also before and after the arrival of people on the move to Europe<sup>10</sup>. As civil society organisations, we should demand a **higher scrutiny on the deployment of such automation**.



Our role as ENAR is to bring this crucial action and connect it with the current work our members are doing in the field. In many cases, they are directly working with the people affected for many years already. Giving a proper name to what their networks are experiencing is a big step towards mobilising these groups and advocating for change. For instance, the **lack of financial and human resources** makes it difficult to allocate time devoted to understanding the deployment of new technologies in the field.

It is important to highlight how the **criminalisation of migration is being widely spread**, and how there seems to be no counter narratives able to dismantle this narrative. If we look at how technologies are being used to outsource people's responsibility and how their deployment exacerbates the vulnerability of people on the move, our participation in digital rights spaces becomes important to advocate for a human rights-based approach that can tackle structural inequalities.

The importance of this kind of activity lies in the urgency of advocacy efforts to **stop the use of automated decision making (ADM) tools**. The use of technologies is not something from the future. Harmful systems are already implemented at our borders and Europe's use of these systems in Greece is but one example of such advanced development.

Experts across Europe discuss the topic of migration from different angles enriching and unravelling the complexity of the subject. The need of **collective organising becomes vital** to pursue advancements towards a fundamental rights-based approach when it comes to automating border management. Organising becomes convoluted, but the value that comes from exchanging knowledge from different perspectives allows to come up with unconventional ways of doing advocacy.

8 Politico (2021). From compassion to fortress of Europe – the migration crisis in pictures. <https://www.politico.eu/article/from-compassion-to-fortress-europe-the-migration-crisis-in-pictures/>

9 European Commission (2021). EU financing for border management and infrastructure. <https://ec.europa.eu/commission/presscorner/api/files/attachment/870395/eu-financing-for-border-management.pdf.pdf>

10 Ozkul, D. (2023). Automating Immigration and Asylum: The Uses of New Technologies in Migration and Asylum Governance in Europe. Oxford: Refugee Studies Centre, University of Oxford. [https://www.rsc.ox.ac.uk/files/files-1/automating-immigration-and-asylum-afar\\_9-1-23.pdf](https://www.rsc.ox.ac.uk/files/files-1/automating-immigration-and-asylum-afar_9-1-23.pdf)

# AI AND MIGRATION IN THE HELLENIC CONTEXT

With our guest speaker, Eleftherios Chelioudakis, we took the opportunity to invite different profiles of the Hellenic civil society to be part of the conversation. We had a wide variety of people attending the event. From staff of the Greek Council for Refugees to other civil society organisations, journalists and researchers. From ENAR, Ojeaku Nwabuzo (then Director of Policy, Advocacy and Network Development) in the role of facilitator and Oyidiya Oji (Policy and Advocacy Advisor for Digital Rights) attended.

Eleftherios provided several examples of how AI had recently been deployed in Greece because, despite its little dimensionality, it is used as a **testing ground for different technologies**. The goal was to show how widespread the use of AI is in the country and the active work that his organisation, Homo Digitalis, is doing to secure more transparency and accountability measures in its use. Overall, this section describes a variety of practices that have been introduced and it is essential to explore their potential risks.

## Facial recognition and automated fingerprint identification tech gear in police stops in Greece

In early 2019, the **Hellenic police signed a contract for EUR 4 million for a smart policing project**. The project was **funded a 75% by the European Commission** through the Internal Security Fund. These smart portable devices were used during police stops that targeted third country nationals overstaying in Greece. Basically, their faces and fingerprints were scanned and the information was sent to their headquarters for identification within their databases. Their information was not only verified in EU databases, but also **included foreign databases such as those of the FBI**. From a data protection perspective, it involves data transfers to the US which has a different framework for law enforcement purposes and migration.

In late 2019, Homo Digitalis submitted a Freedom of Information Act (FOIA) without receiving any response. A FOIA allows EU citizens, but also EU residents and civil society to obtain information from institutions at a European, national and local level. The Hellenic Police did not provide clear answers to the request. Later, in March 2020, they filed a complaint to the Greek Data Protection Authority (DPA) to request more information. Some of the questions raised in the complaint were related to the duration of the data kept in their databases and the purpose of its collection. Homo Digitalis at that time claimed that there was no legal basis for the use of such kind of devices and **no human rights assessment** was conducted prior to the contract's signature.

Fortunately, in August 2020, the Greek DPA started an official investigation into the contract's agreements. In the meantime, in late 2021, the Hellenic Police acquired the smart devices, but as per confirmation of Homo Digitalis, they are not in use.

## KENTAUROS: Surveillance system in facilities hosting asylum seekers in the Greek islands

In December 2020, the Hellenic Ministry of Digital Governance announced the development of the IT system KENTAUROS for managing electronic and physical security around and inside the facilities hosting asylum seekers. This system would use **CCTV, drones and behavioural analytics with the help of AI**. Some of the functions include:

- Signalling alarms of irregular behaviour of individuals or group of individuals in common areas within the facilities.
- Deploying drones to assess incidents without human intervention.



In October 2021, Homo Digitalis submitted a FOIA request to the Hellenic Ministry of Immigration and Asylum for more information about the project and access to related documentation, such as the data protection impact assessment. In February 2022, Homo Digitalis with the Hellenic League for Human Rights, HIAS Greece and Dr. Niovi Vavoula (Lecturer at Queen Mary University of London) submitted a request for investigation before the Hellenic DPA on this project<sup>11</sup>. As a result, the Hellenic DPA started an official investigation<sup>12</sup>.

At the moment of the drafting of this report, the **Hellenic DPA has fined the Ministry of Migration and Asylum for this system together with another AI system**<sup>13</sup>. This resulted in the largest penalty to a public authority ever imposed in Greece. However, the impact on people on the move is still ongoing, and there should be other mechanisms put in place to mitigate the risks that these systems inflict in their lives.

## Hellenic Coast Guard tender call for social media monitoring

In February 2022, The Hellenic Coast Guard published a call for acquiring a **social media monitoring software targeting social platforms** like Instagram, Twitter, Facebook, VK and Xing, as well as the instant messaging app Telegram<sup>14</sup>. The estimated cost of the project was € 900,000. The call made references to the **use of bots and the need for these to not be detected by the platforms**. Also, in the same month, Homo Digitalis, The Hellenic League for Human Rights, HIAS Greece, Privacy International and the researcher Phoebus Simeonidis submitted before the Hellenic Data Protection Authority a request to investigate this tender call. Homo Digitalis reached out to the Hellenic DPA for a follow-up on its actions, but the reply is still pending.

On another note, it is important to highlight that many companies who were awarded contracts were former traditional security businesses that transitioned to digital security. While some are of Greek origin, others are based in various EU countries and even in the US.

11 Homo Digitalis (2022). The Hellenic DPA is requested to take action again the deployment of ICT systems IPERION & KENTAUIROS in facilities hosting asylum seekers in Greece. <https://www.homodigitalis.gr/en/posts/10874>

12 Homo Digitalis (2022). A major success for civil society in Greece: The Hellenic DPA launches an investigation into the Ministry of Immigration and Asylum re the YPERION and KENTAYROS IT systems. <https://www.homodigitalis.gr/en/posts/11024>

13 Homo Digitalis (2022). The Hellenic Data Protection Authority fines the Ministry of Migration and Asylum for the 'Centaurus' and 'Hyperion' systems with the largest penalty ever imposed to a Greek public body. [https://homodigitalis.gr/wp-content/uploads/2024/04/PressRelease\\_HomoDigitalis\\_Fine-175.000-euro\\_Hellenic\\_DataProtectionAuthority\\_Artificial\\_Intelligence\\_Biometrics\\_KENTAUIROS\\_HYPERION-Avtylpaqr1-1.pdf](https://homodigitalis.gr/wp-content/uploads/2024/04/PressRelease_HomoDigitalis_Fine-175.000-euro_Hellenic_DataProtectionAuthority_Artificial_Intelligence_Biometrics_KENTAUIROS_HYPERION-Avtylpaqr1-1.pdf)

14 Homo Digitalis (2022). The Hellenic DPA is investigating the Greek Coast Guard for social media monitoring. <https://www.homodigitalis.gr/en/posts/12490>

## The importance of working together: Learnings from the coalition #ProtectNotSurveil

Through the long discussion, we remarked the importance to find a knowledge balance between digital rights and social justice organisations to incorporate their practices and have a 360 view of people affected and how they can be supported through the work of digital rights organisations.

At the same time, we are seeing the urgency of connecting with national and regional human rights organisations. Their specific knowledge and support could help us reach MEPs from their country of origin. Apart from this, we learned the importance of **not fighting our battles alone**. A joint collaboration with different civil society organisations helps to have a broader vision of what digital rights should look like and how to prioritise common interests. The coalition #ProtectNotSurveil is one example of this practise. At its core, it wanted to host digital rights, migrant and social justice organisations for a common goal: **Advocate for a better digital regulation of the AI Act, the first regulation of its kind**.

Everything started with a joint statement launched in December 2022<sup>15</sup> that got 200 signatures. This overwhelming response from civil society organisations made possible the launch of the campaign #ProtectNotSurveil<sup>16</sup>. This push was an amazing opportunity to demand changes to the proposal drafted by the European Commission. In a nutshell, it was a way to influence politicians at the European Parliament. The 4 key points that the coalition advocated for were the following:

- The prohibition of unacceptable uses of AI systems in the context of migration.
- Expand the list of high risk systems used in migration.
- Ensure the AI Act applies to AI systems part of EU migration databases.
- Ensure transparency and oversight measures to apply also in the migration context.

However, we understand at an individual and coalition level that the fight cannot stop with the AI Act put in place. The first regulation of its kind embraces concepts like fundamental right impact assessments which opens space for civil society to challenge some systems, the registration of high-risk systems in a public database, with the exemption on biometrics used in policing and migration, and the possibility of individual complaints for the people affected. However, the **AI Act does not go far enough to prevent harm**, enabling the use of harmful systems in policing, national security and migration, despite the documented evidences of the harm that data-driven practices inflict on migrants, racialised people and other marginalised communities. Despite all this, the coalition managed to gather knowledge, expertise and a collective vision and put migration issues on the agenda. Looking at the very near future, we must make sure that the implementation processes have a fundamental rights-based approach, and consultations which include both civil society and affected communities. Apart from this, there are other regulations being discussed at the moment or agreed upon, like the **Migration Pact**, that contains a high intervention of technology in its procedures. It is absolutely necessary to say that civil society must organise to **fight against the automation of our borders and to advocate for safe routes instead**.

15 Access Now, European Digital Rights (EDRI), the Platform for International Cooperation on Undocumented Migrants (PICUM), and the Refugee Law Lab. With the support of Amnesty International, Avaaz, Border Violence Monitoring Network (BVMN), EuroMed Rights, European Center for Not-for-Profit Law (ECNL), European Network Against Racism (ENAR), Homo Digitalis, Privacy International, Statewatch, Dr Derya Ozkul, Dr. Jan Tobias, and Dr Niovi Vavoula (2022). Joint statement: The EU AI Act must protect people on the move. <https://www.accessnow.org/press-release/joint-statement-ai-act-people-on-the-move/>

16 #Protect Not Surveil (2024). <https://protectnotsurveil.eu/>

# CONCLUSIONS AND WAY FORWARD

**The goal of this report is to collect the different topics that were discussed during the roundtable. The variety of participants helped to enrich the content prepared for the session with questions and doubts about the use of AI in Greek territory.**

After the event, we felt hopeful and invigorated to keep ourselves more organised and informed about what happens in Greece, and how to promote the use of AI to rescue people instead of provoking more pushbacks. However, the use of technology to control and oversee migration should be further investigated.

In order to get the clarity that we need to understand the deployment of such applications, we should ask, as civil society organisations, more transparency and accountability. ENAR provides 3 suggestions that would help enrich collaboration between organisations and support the work in the digital rights ecosystem:

## 1. Cooperation between civil society and grassroots organisations is essential for a bigger impact

If we want to advocate for changes in our society we should **not organise separately nor alone**. Representation matters, and making sure your group is as heterogeneous as possible will be a great asset, as we have higher chances of success for several reasons:

- Your network can expand thanks to the different connections your organisation will make.
- Some actions will have a more powerful impact. For example, something that was mentioned during the meeting was that FOIA requests promoted by several organisations provided more power and legitimacy to the action.
- There is no organisation that knows everything. Working in coalition or working groups can help to fill the gaps within your organisation.

## 2. The AI Act is an opportunity to avoid mistakes from the past

As it was commented during the celebration of the event, there are already precedents of a failed enforcement for a digital law. The General Data Protection Regulation (GDPR), which was put into effect in 2018, was a very ambitious framework to exercise our data privacy and security. After 5 years, we have seen that there is **no effective way of enforcing it**<sup>17</sup>. As a result, the European Commission should focus on frameworks with strict and clear guidelines that all Member States should follow, thereby preventing loopholes. Law makers should learn from previous experiences, like the GDPR, and use the opportunity of the AI Act to debate how to be more human rights centred when speaking about migration and the impact of AI on people on the move.

## 3. Migration + tech topics should be more discussed in social and racial justice movements

Organisations working on **migration and tech** must learn in depth the priorities and challenges from **migrant-led organisations** and how they can contribute to social and racial justice strategies. On the other hand, engaging in the technological aspect of migration is key to understanding the incessant rhetoric of securitisation at European borders.

In order to enable different movements to work together, wording is very important. How we describe the technologies that are put in place at European borders can help facilitate connections between human rights defenders and civil society organisations with digital organisations. In order to transfer knowledge to our networks, we should consciously make sure everyone in the room understands the terminology we are using and go back to basics if needed. This would ensure more interest in migration and tech topics and a stronger mass supporting our advocacy and campaigns. Ensuring accessible terminology would increase interest around the issue from more people and assist in advocating for better policies; policies that ensure safer routes for people on the move, in a way that fundamental rights are respected.

<sup>17</sup> Burgess, M. (2022). How GDPR is failing. <https://www.wired.com/story/gdpr-2022/>





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